REMARKS

Claims 1-16 are pending in the Application after entry of this amendment. Claims 1, 11, and 14 are amended. Support for the amendments can be found on at least on page 27, line 17-page 28, line 17 and FIG. 2a of the Specification as originally filed. No new matter is added by way of this Amendment.

Regarding claim rejections under 35 U.S.C. § 102.

Claims 1-16 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6,199,136, hereinafter, "Shteyn." Applicants respectfully traverse the rejections.

First, Applicants respond to paragraphs 24-30 of the present Office Action. Even if Shteyn describes an abstract object (network device) detecting a configuration change and transferring information relevant to the change to an application (remote server) as proposed in the Office Action, Shteyn still does not teach Applicants' "a remote server…searching a database for content…to be downloaded to the network device," recited in Applicants' now amended claim 1.

In stark contrast, Shteyn merely describes instances of embedded abstract representations (content) that do not need to be uploaded and instances of abstract representations (content) that are already uploaded registered with a registry (database) for other objects in the network to find. *See* Shteyn, column 3, line 42-column 4, line 4; and column 4, lines 26-50. Because Shteyn's registry contains <u>only</u> instances that either <u>do not need to be uploaded</u> or are <u>already uploaded,</u> there is no use for Shteyn's application (remote server) to search the registry (database) for an abstract representation (content) to be uploaded (downloaded) to the abstract object (network device). Accordingly, Applicants respectfully submit that Shteyn does not teach this feature of Applicants' now amended claim 1. Applicants further submit that Shteyn also fails to teach other features of Applicants' now amended claim 1.

Applicants' amended claim 1 recites in pertinent part:

> a network device detecting a change in a configuration of the network device and transferring information regarding the configuration change, <u>the information transferred via a first network path;</u>

a remote server receiving the information regarding the
configuration change and in response to the information received,
searching a database for content (i) corresponding to the
configuration change, (ii) supporting the configuration change to
the network device, by comparing the information received to
content stored in the database, and (iii) to be downloaded to the
network device;

the remote server sending a message notifying the network device
of a location of the content corresponding to the configuration
change, the message sent via the first network path;

the network device requesting download of the content at the
location identified in the message, a request sent via a second
network path different than the first network path; and

the remote server downloading the content to the network device in
response to the request, via the second network path, and in
parallel, instructing the network device, via the first network path,
how to install the content downloaded

where the underlined text indicates elements added by way of the amendment.

Applicants' claimed technique is triggered when a user installs a peripheral device on a
network device for which the network device requires a driver. *See* Specification, page 27, line
17-page 28, line 17. In a typical example, the user plugs in a peripheral device, such as a joy
stick into a port such as a serial port or USB (universal serial bus) port resulting in a plug and
play string from the peripheral device. *Id.* In Applicants' claimed technique, a system agent
sends the plug and play string to a system manager along a path between the system agent and
the system manager (via a message router and respective queue managers). *Id.* referring to block
1002. The system manager having located a valid device driver sends a message to the system
agent along the same path between the system agent and the system manager to download the
driver. *Id.* referring to block 1008.

The system agent requests a bulk data transfer agent to download the driver. *See*
Specification, page 27, line 17-page 28, line 17 referring to block 1010. The bulk data transfer
agent then contacts the bulk data transfer manager and downloads the device driver from the
bulk data transfer manager along a path different from the path between the system agent and the
system manager. *Id.* In parallel, over the different paths, the bulk data transfer agent downloads
the device driver from the bulk data transfer manager, while the system manager instructs the

system agent on how to install the device driver on the network device. *Id.* Accordingly, Applicants' claim technique separates an event driven content installation on a network device over <u>two different network paths</u> between a remote server and the network device.

Shteyn does not teach two different network paths between a FAV (remote server) and BAV/PC (network device). In stark contrast, Shteyn merely describes a single IEEE 1394 bus between the FAV (remote server) and the BAV (network device). *See* Shteyn, column 7, lines 23-62 referring to FIG. 1. *See also* Shteyn, column 8, lines 24-52 (single bus between PC (network device) to FAV (remote server)).

Because Shteyn merely describes a single connection or path between the FAV and BAV/PC, it stands to reason that Shteyn cannot teach at least the following features recited in Applicants' now amended claim 1:

> 1) network device…transferring information…<u>via a first network path;</u>
>
> 2) network device requesting download of the content…, a request sent <u>via a second network path different than the first network path;</u> and
>
> 3) remote server downloading the content to the network device…, via the second network path, and <u>in parallel, instructing the network device, via the first network path, how to install the content downloaded.</u>

(Emphasis added.)

Differences are further highlighted by comparing Applicants' FIG. 2a with Shteyn's FIG. 1. Applicants' FIG. 2a clearly illustrates between a server system (remote server) and an embodied client system (network device) a first network path (in particular, from a system manager to a system agent, via respective queue managers and a message router) and a second network path (in particular, from a bulk data transfer manager to a bulk data transfer agent). In stark contrast, Shteyn's FIG. 1 merely illustrates one IEEE 1394 connection between a FAV (remote server) and a BAV/PC (network device). As such, Applicants respectfully submit that Shteyn does not teach each and every element of Applicants' now amended claim 1.

Accordingly, Applicants respectfully submit that Applicants' now amended claim 1 overcomes the rejection under 35 U.S.C. 102(a) and respectfully request claim 1 be allowed.

Claims 11 and 14 recite similar elements, and as such, should be allowed for similar reasons as claim 1.

Claims 2-10 depend from claim 1; claims 12-13 depend from claim 11; and claims 15-13 depend from claim 14. As such, these claims should be allowed for the same reasons as the claims from which they depend.

CONCLUSION

In view of the above amendments and remarks, it is believed that all claims are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

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